



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

December 29, 2008

*Electronic Mail – Received Receipt Requested.*

Mr. William Reichel, Plant General Manager  
Florida Power and Light Company  
Post Office Box 176  
Indiantown, Florida 34956

Re: Permit No. 0850001-018-AV  
Martin Plant  
Title V Air Operation Permit Renewal

Dear Mr. Reichel:

One copy of the Proposed Determination for the Title V Air Operation Permit Renewal for the Martin Plant, located 7 miles North of Indiantown on State Road 710, in Indiantown is enclosed. This letter is only a courtesy to inform you that the Draft Title V Air Operation Permit has now become a Proposed Title V Air Operation Permit. An electronic version of this determination has been posted on the Division of Air Resources Management's web site for the United States Environmental Protection Agency (USEPA) Region 4 office's review. The web site address is: <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>. Pursuant to Section 403.0872(6), Florida Statutes, if no objection to the Proposed Permit is made by the USEPA within 45 days, the Proposed Title V Air Operation Permit will become a Final Title V Air Operation Permit no later than 55 days after the date on which the Proposed Title V Air Operation Permit was mailed (posted) to USEPA. If USEPA has an objection to the Proposed Title V Air Operation Permit, the Final Title V Air Operation Permit will not be issued until the permitting authority receives written notice that the objection is resolved or withdrawn.

If you have any questions, please contact the Project Engineer, Tom Cascio, by telephone at 850-921-9526 or by email at [tom.cascio@dep.state.fl.us](mailto:tom.cascio@dep.state.fl.us).

Sincerely,

*Syed Arif*  
for Trina L. Vielhauer  
Chief  
Bureau of Air Regulation

TLV/jkh/tbc

Enclosure

Copies sent by electronic mail (return receipt requested) to the following:

Mr. William Reichel, Florida Power and Light Company: [Bill\\_Reichel@fpl.com](mailto:Bill_Reichel@fpl.com)  
Ms. Sheila M. Wilkinson, Florida Power and Light Company: [Sheila\\_Wilkinson@fpl.com](mailto:Sheila_Wilkinson@fpl.com)  
Mr. Kennard Kosky, Golder Associates: [kkosky@golder.com](mailto:kkosky@golder.com)  
Ms. Katy Forney, U.S. EPA Region 4: [forney.kathleen@epa.gov](mailto:forney.kathleen@epa.gov)  
Ms. Ana Oquendo, U.S. EPA Region 4: [oquendo.ana@epamail.epa.gov](mailto:oquendo.ana@epamail.epa.gov)  
Mr. Joe Lurix, Southeast District Office: [joe.lurix@dep.state.fl.us](mailto:joe.lurix@dep.state.fl.us)  
Ms. Barbara Friday, DEP BAR: [Barbara.Friday@dep.state.fl.us](mailto:Barbara.Friday@dep.state.fl.us) (for posting with U.S. EPA, Region 4)  
Ms. Vickie Gibson, DEP BAR: [Victoria.Gibson@dep.state.fl.us](mailto:Victoria.Gibson@dep.state.fl.us) (read file copy)

# PROPOSED PERMIT DETERMINATION

Proposed Permit No. 0850001-018-AV

## I. Public Notice.

An Intent To Issue A Title V Air Operation Permit Renewal to Florida Power and Light Company for the Martin Plant, located 7 miles North of Indiantown on State Road 710, in Indiantown, Martin County, was clerked on October 22, 2008. The Public Notice Of Intent To Issue A Title V Air Operation Permit Renewal was published in the Stuart News on November 24, 2008. The Draft Title V Air Operation Permit was available for public inspection at the permitting authority's office in Tallahassee. Proof of publication of the Public Notice Of Intent To Issue A Title V Air Operation Permit Renewal was received on December 1, 2008.

## II. Public Comment(s).

No comments were received from the Public during the 30 (thirty)-day public comment period, however, comments were received from the Permittee. The comments were not considered significant enough to reissue the Draft Title V Air Operation Permit and require another Public Notice, therefore, the Draft Title V Air Operation Permit was changed. Those comments are addressed below. Additions to the permit are indicated by a double underline. Deletions from the permit are indicated by a ~~strike through~~.

### Letter from Florida Power and Light Company dated December 19, 2008.

#### Comment 1.

Subsection C, Applicable Regulations Table needs to be corrected.

#### Response 1.

The Department agrees with this comment. The table is corrected as follows.

40 CFR 60, Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971
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001, 002, <del>003, 004, 005, 006</del>
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#### Comment 2.

Page 5, **FW1**. Appendices. FPL requests that the word "all" be replaced by "all applicable".

#### Response 2.

The Department disagrees with the comment. All documents shall be complied with (notwithstanding that some sections of some documents may be deemed not applicable).

#### Comment 3.

Page 5, **Section II, Facility-Wide Conditions, FW2.:**

FPL requests the statement "**Not Federally Enforceable**" be added to the beginning of the condition.

#### Response 3.

The Department disagrees with this comment and believes the specific condition is valid as written.

**Comment 4.**

Page 5, **FW4. General Visible Emissions.** FPL requests that the following phrase be added to the first sentence as in the existing Title V permit: “Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall ... “.

**Response 4.**

The Department disagrees with the comment. The current wording of the specific condition is consistent with the Department rules.

**Comment 5.**

Page 6, **FW10. Clean Air Initiative Rule (CAIR) Applicable Units.** FPL requests wording changes dealing with certain application requirements be made to the condition.

**Response 5.**

The Department does not agree with this comment. While it is true that application data is not typically enforceable, the CAIR application is like an Acid Rain part that we simply incorporate into the permit as submitted by the applicant. Complying with the CAIR application will help to assure compliance with the CAIR rule pending any required revisions to the Title V permit.

**Comment 6.**

Page 7, **A.2. Permitted Capacity.** FPL requests that the following permitting note from the current Title V permit noted below be reinstated in the specific condition.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

**Response 6.**

The Department does not agree with this comment since the heat input limits were established in prior air construction permits.

**Comment 7.**

FPL requests that Specific Condition A.16. be corrected for accuracy.

**Response 7.**

The Department agrees with this comment. The specific condition is modified as follows.

**A.16. Performance Specifications.** For the purposes of 40 CFR 60.13, all continuous monitoring systems required under applicable subparts shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, Appendix F of 40 CFR 60, or 40 CFR 75, unless otherwise specified in an applicable subpart or by the Administrator. Appendix F is applicable December 4, 1987. [40 CFR 60.13(a)]

**Comment 8.**

FPL requests that a test method be added to the table of Specific Condition A.28..

**Response 8.**

The Department agrees with this comment. The specific condition is modified as follows.

5, 5B, <u>17</u>	Method for Determining Particulate Matter Emissions (All PM is assumed to be PM <sub>10</sub> .)
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**Comment 9.**

Page 23, **B.2. Permitted Capacity.** FPL requests that the following permitting note from the current Title V permit noted below be reinstated in the specific condition.

{Permitting note: The heat input limitations have been placed in each permit to identify the capacity of each unit for the purposes of confirming that emissions testing is conducted within 90 to 100 percent of the unit's rated capacity (or to limit future operation to 110 percent of the test load), to establish appropriate emission limits and to aid in determining future rule applicability.}

**Response 9.**

The Department does not agree with this comment since the heat input limits were established in prior air construction permits.

**Comment 10.**

FPL requests that a test method be added to the table of Specific Condition B.30.

**Response 10.**

The Department agrees with this comment. The specific condition is modified as follows.

<u>3</u>	<u>Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources</u>
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**Comments 11 and 12.**

Specific Conditions **B.31.** and **B.32.** FPL requests that compliance testing requirements for VOC emissions be removed from the Title V permit.

**Responses 11 and 12.**

The Department disagrees with these comments since removing the testing requirements will require an air construction permit modification to implement. See also Specific Condition TR.7. in the Appendix.

**Comment 13.**

FPL requests that a test method be added to the table of Specific Condition C10.

**Response 13.**

The Department agrees with this comment. The specific condition is modified as follows.

6C	<u>Determination of Sulfur Dioxide Emissions from Stationary Sources</u>
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**Comment 14.**

FPL requests that a permitting note be added to Specific Condition C.11.

**Response 14.**

The requested note is already included in renumbered Specific Condition C.14.

**Comment 15.**

FPL requests that wording changes be made to the NESHAP requirements generic Specific Condition D.1.

**Response 15.**

The Department believes that the condition is appropriate as written.

**Comment 16.**

FPL requests a modification be made to the excess emissions allowed condition (E.14.) for fuel switching.

**Response 16.**

This change would require an air construction permit modification to implement.

**Comment 17.**

Page 61. **Section V, Appendices.** FPL requests a revision to the statement “The Following Appendices Are Enforceable Parts of This Permit”.

**Response 17.**

The Department agrees to change the subtitle as follows:

The Following Appendices Are Enforceable ~~Parts Of This Permit~~ As Allowed By Rule Applicability And Are Supporting Documents For The Air Operating Permit:

**III. Conclusion.**

The permitting authority will issue the Proposed Title V Air Operation Permit Number 0850001-018-AV, with the minor changes indicated above.

**Friday, Barbara**

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**To:** Bill\_Reichel@fpl.com  
**Cc:** Sheila\_Wilkinson@fpl.com; 'KKosky@Golder.com'; Forney.Kathleen@epamail.epa.gov; Oquendo.Ana@epamail.epa.gov; Lurix, Joe; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan  
**Subject:** FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV  
**Attachments:** 0850001-018ProposedCoverLetter.pdf; Proposed Determination 2008 12-24-08.doc

Dear Sir/ Madam:

Attached is the official **Proposed Permit Determination** for the project referenced below. Click on the link displayed below to access the permit project documents and send a "reply" message verifying receipt of the document(s) provided in the link; this may be done by selecting "Reply" on the menu bar of your e-mail software, noting that you can view the documents, and then selecting "Send". **We must receive verification that you are able to access the documents.** Your immediate reply will preclude subsequent e-mail transmissions to verify accessibility of the document(s).

Click on the following link to access the permit project documents:

[http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf\\_permit\\_zip\\_files/0850001.018.AV.P\\_pdf.zip](http://ARM-PERMIT2K.dep.state.fl.us/adh/prod/pdf_permit_zip_files/0850001.018.AV.P_pdf.zip)

Attention: Tom Cascio

Owner/Company Name: FLORIDA POWER and LIGHT (PMR)

Facility Name: MARTIN POWER PLANT

Project Number: 0850001-018-AV

Permit Status: PROPOSED

Permit Activity: PERMIT RENEWAL

Facility County: MARTIN

The Bureau of Air Regulation is issuing electronic documents for permits, notices and other correspondence in lieu of hard copies through the United States Postal System, to provide greater service to the applicant and the engineering community. Access these documents by clicking on the link provided above, or search for other project documents using the "*Air Permit Documents Search*" website at <http://www.dep.state.fl.us/air/eproducts/apds/default.asp>.

Permit project documents addressed in this email may require immediate action within a specified time frame. Please open and review the document(s) as soon as possible, and verify that they are accessible. Please advise this office of any changes to your e-mail address or that of the Engineer-of-Record. If you have any problems opening the documents or would like further information, please contact the Florida Department of Environmental Protection, Bureau of Air Regulation at (850)488-0114.

Barbara Friday

Bureau of Air Regulation

Division of Air Resource Management (DARM)

(850)921-9524

## Friday, Barbara

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**From:** Exchange Administrator  
**Sent:** Monday, December 29, 2008 1:58 PM  
**To:** Friday, Barbara  
**Subject:** Delivery Status Notification (Relay)  
**Attachments:** ATT198798.txt; FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT;  
0850001-018-AV

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

[Bill\\_Reichel@fpl.com](mailto:Bill_Reichel@fpl.com)  
[Sheila\\_Wilkinson@fpl.com](mailto:Sheila_Wilkinson@fpl.com)

## Friday, Barbara

---

**From:** Wilkinson, Sheila M [Sheila.M.Wilkinson@fpl.com]  
**To:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 1:59 PM  
**Subject:** Read: FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV

Your message

**To:** [Sheila.M.Wilkinson@fpl.com](mailto:Sheila.M.Wilkinson@fpl.com)  
**Subject:**

was read on 12/29/2008 1:59 PM.



## Friday, Barbara

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**From:** Wilkinson, Sheila M [Sheila.M.Wilkinson@fpl.com]  
**Sent:** Monday, December 29, 2008 1:59 PM  
**To:** Friday, Barbara  
**Subject:** Out of Office: FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT;  
0850001-018-AV

I will be on out of the office starting the afternoon of Friday December 19, 2008. I will return to the office on Friday January 2, 2009.

If you need immediate assistance, please contact me on my cell phone at 561-373-7042.

Thank you and have a safe holiday season!

## Friday, Barbara

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**From:** Mail Delivery System [MAILER-DAEMON@mx1.golder.com]  
**Sent:** Monday, December 29, 2008 1:58 PM  
**To:** Friday, Barbara  
**Subject:** Successful Mail Delivery Report  
**Attachments:** Delivery report; Message Headers

This is the mail system at host mx1.golder.com.

Your message was successfully delivered to the destination(s) listed below. If the message was delivered to mailbox you will receive no further notifications. Otherwise you may still receive notifications of mail delivery errors from other systems.

The mail system

<KKosky@Golder.com>: delivery via 127.0.0.1[127.0.0.1]:10025: 250 OK, sent  
49591DC7\_31820\_40286\_1 6E7571CF069E

**Friday, Barbara**

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**From:** System Administrator  
**To:** Lurix, Joe; Holtom, Jonathan  
**Sent:** Monday, December 29, 2008 1:58 PM  
**Subject:** Delivered:FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV

Your message

**To:** [Bill Reichel@fpl.com](mailto:Bill.Reichel@fpl.com)  
**Cc:** [Sheila Wilkinson@fpl.com](mailto:Sheila.Wilkinson@fpl.com); 'KKosky@Golder.com'; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Lurix, Joe; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan  
**Subject:** FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV  
**Sent:** 12/29/2008 1:58 PM

was delivered to the following recipient(s):

Lurix, Joe on 12/29/2008 1:58 PM  
Holtom, Jonathan on 12/29/2008 1:58 PM

## Friday, Barbara

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**From:** Holtom, Jonathan  
**To:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 2:47 PM  
**Subject:** Read: FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV

Your message

**To:** [Bill Reichel@fpl.com](mailto:Bill.Reichel@fpl.com)  
**Cc:** [Sheila Wilkinson@fpl.com](mailto:Sheila.Wilkinson@fpl.com); 'KKosky@Golder.com'; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov);  
[Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Lurix, Joe; Gibson, Victoria; Cascio, Tom; Holtom,  
Jonathan  
**Subject:** FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV  
**Sent:** 12/29/2008 1:58 PM

was read on 12/29/2008 2:47 PM.

## Friday, Barbara

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**From:** System Administrator  
**To:** Gibson, Victoria; Cascio, Tom  
**Sent:** Monday, December 29, 2008 1:58 PM  
**Subject:** Delivered:FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV

Your message.

**To:** [Bill Reichel@fpl.com](mailto:Bill.Reichel@fpl.com)  
**Cc:** [Sheila Wilkinson@fpl.com](mailto:Sheila.Wilkinson@fpl.com); 'KKosky@Golder.com'; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov); [Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Lurix, Joe; Gibson, Victoria; Cascio, Tom; Holtom, Jonathan  
**Subject:** FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV  
**Sent:** 12/29/2008 1:58 PM

was delivered to the following recipient(s):

Gibson, Victoria on 12/29/2008 1:58 PM  
Cascio, Tom on 12/29/2008 1:58 PM

## Friday, Barbara

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**From:** Cascio, Tom  
**To:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 2:57 PM  
**Subject:** Read: FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV

Your message

**To:** [Bill Reichel@fpl.com](mailto:Bill_Reichel@fpl.com)  
**Cc:** [Sheila Wilkinson@fpl.com](mailto:Sheila_Wilkinson@fpl.com); 'KKosky@Golder.com'; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov);  
[Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Lurix, Joe; Gibson, Victoria; Cascio, Tom; Holtom,  
Jonathan  
**Subject:** FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV  
**Sent:** 12/29/2008 1:58 PM

was read on 12/29/2008 2:57 PM.

## Friday, Barbara

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**From:** Gibson, Victoria  
**To:** Friday, Barbara  
**Sent:** Monday, December 29, 2008 2:01 PM  
**Subject:** Read: FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV

Your message

**To:** [Bill Reichel@fpl.com](mailto:Bill.Reichel@fpl.com)  
**Cc:** [Sheila Wilkinson@fpl.com](mailto:Sheila.Wilkinson@fpl.com); 'KKosky@Golder.com'; [Forney.Kathleen@epamail.epa.gov](mailto:Forney.Kathleen@epamail.epa.gov);  
[Oquendo.Ana@epamail.epa.gov](mailto:Oquendo.Ana@epamail.epa.gov); Lurix, Joe; Gibson, Victoria; Cascio, Tom; Holtom,  
Jonathan  
**Subject:** FLORIDA POWER & LIGHT COMPANY - MARTIN POWER PLANT; 0850001-018-AV  
**Sent:** 12/29/2008 1:58 PM

was read on 12/29/2008 2:01 PM.